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## MEMO ENDORSED

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*Via ECF*

January 29, 2020

Hon. Kenneth M. Karas  
United States District Court  
300 Quarropas Street  
White Plains, NY

Re: Hay v. PBR Sales LLC *et al.*  
Case No. 7:18-cv-05736-KMK

Dear Judge Karas:

This firm represents Plaintiff Monte Ting Hay in this above action.

I am respectfully requesting an extension of time through February 14<sup>th</sup> in order to complete and file with the Court a motion for default judgment and all ancillary documents. This is the Plaintiff's first such request.

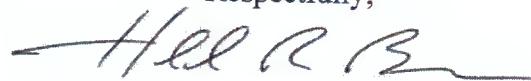
I am making this request on account of a number of personal and professional issues that have arisen since December 18<sup>th</sup>, which include my active involvement in an elderly family member's recovery and care following a lengthy hospitalization, my preparation for and attendance at a trial conducted last week in Connecticut, and extensive efforts undertaken to open and vacate a judgment of foreclosure prior to my clients being ejected from their property. I have also requested and am awaiting receipt of certain information from my client and do not know whether recent events in Hong Kong and China (the ongoing protests in Hong Kong and now the coronavirus outbreak) will impede either his ability to communicate with me or my ability to receive information from him.

Finally, as the Court may be aware, notices mailed by the Clerk to Mr. Sapra have been returned as undelivered. Efforts are being undertaken to locate his whereabouts so that actual notice of these proceedings can be made.

I anticipate that all documentation needed in support the motion for default judgment will be available prior to February 14<sup>th</sup> in which case the motion will be filed as soon as it is ready.

Thank you for your consideration of this request. Should the Court have any questions, we are available to address them at the Court's convenience.

Respectfully,



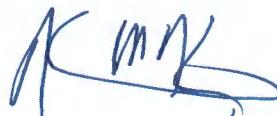
Harold R. Burke

HRB/st

cc. Client

Granted.

So ordered.



1/30/20